

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

IN RE: Premera Blue Cross Customer Data  
 Security Breach Litigation

---

Case No. 3:15-md-2633-SI

**[PROPOSED] CASE  
 SCHEDULING ORDER**

This Document Relates to All Actions.

**Action/Event**

- |   |  |
|---|--|
| 1. <b>Initial Case Management Conference</b><br>and appointment of interim class counsel and other Plaintiffs' counsel leadership positions   | August 7, 2015                             |
| 2. Deadline for parties to file proposed protective order(s)  | August 28, 2015                            |
| 3. Defendant to produce initial categories of documents as agreed by the parties  | September 11, 2015                         |
| 4. Plaintiffs file Consolidated Master Complaint  | October 6, 2015<br>(60 days after No.1)    |
| 5. Interim lead counsel and liaison plaintiffs' counsel file leadership structure and responsibilities  | October 6, 2015<br>(60 days after No.1)    |
| 6.. Parties confer about ADR  | November 13, 2015                          |
| 7. Defendant answers or otherwise responds  | November 20, 2015<br>(45 days after No. 4) |
| 8. Deadline for parties' Rule 26(f) and LR 26-1 conference, including ESI guidelines<br>Formal discovery may proceed  | December 4, 2015                           |
| 9. Parties file Rule 26(f) report<br><br>Deadline for parties to file proposed ESI protocol(s)<br>Deadline to establish document depository<br>Initial disclosures served or waived under LR 26-2 | December 18, 2015<br>(14 days after No. 6) |
| 10. Plaintiffs file response to motion to dismiss, if any   | December 30, 2015<br>(40 days after No. 7) |

11.	Defendant files reply in support of any motion to dismiss	January 29, 2016 (30 days after No. 10)
12.	Oral argument on motion to dismiss, if any <b>Second Case Management Conference</b>	February 24, 2016, 10AM
13.	Parties file Joint ADR Report under LR 16-4(d)	April 17, 2016
14.	Deadline to amend pleadings or join parties	July 19, 2016
15.	<b>Third Case Management Conference</b>	August 2, 2016, 10AM
16.	File motion for class certification	October 12, 2016
17.	File response to motion for class certification	November 12, 2016
18.	File reply in support of motion for class certification	December 12, 2016
19.	Oral argument on class certification motion <b>Fourth Case Management Conference</b>	January 12, 2017, 10AM
20.	Fact discovery closes	March 17, 2017
21.	Simultaneous exchange of expert reports (Expert depositions to be scheduled by parties)	April 17, 2017
22.	Simultaneous exchange of expert rebuttal reports	May 17, 2017
23.	Expert discovery closes	June 16, 2017
24.	<b>Fifth Case Management Conference</b> (Should limited fact or expert discovery be reopened?)	June 30, 2017, 10AM
25.	Deadline for filing dispositive motions	September 1, 2017
26.	File responses to dispositive motions	September 29, 2017 (28 days after No. 25)
27.	File replies to dispositive motions	October 27, 2017
28.	Oral argument on dispositive motions <b>Sixth Case Management Conference</b>	November 17, 2017, 10AM
29.	First pretrial conference	January 31, 2018, 10AM

30. Second pretrial conference February 9, 2018, 10AM
31. Trial commences February 26, 2018, 9AM  
(either class or non-class for bellwether case originally filed in District of Oregon)

Dated: 8/21/2015

Respectfully Submitted,

**TOUSLEY BRAIN STEPHENS PLLC**

By: s/ Kim D. Stephens  
Kim D. Stephens, OSB No. 030635  
Christopher I. Brain  
Chase C. Alvord, OSB No. 070590  
Jason T. Dennett  
1700 Seventh Avenue, Suite 2200  
Seattle, WA 98101  
Tel: (206) 682-5600  
Fax: (206) 682-2992  
Email: [cbrain@tousley.com](mailto:cbrain@tousley.com)  
[kstephens@tousley.com](mailto:kstephens@tousley.com)  
[calvord@tousley.com](mailto:calvord@tousley.com)  
[jdennett@tousley.com](mailto:jdennett@tousley.com)

*Interim Lead Plaintiffs' Counsel*

**STOLL STOLL BERNE LOKTING & SHLACHTER P.C.**

By: s/ Keith S. Dubanevich  
Keith S. Dubanevich, OSB No. 975200  
Steve D. Larson, OSB No. 863540  
Mark A. Friel, OSB No. 002592  
209 SW Oak Street, Suite 500  
Portland, OR 97204  
Tel: (503) 227-1600  
Fax: (503) 227-6840  
Email: [kdubanevich@stollberne.com](mailto:kdubanevich@stollberne.com)  
[slarson@stollberne.com](mailto:slarson@stollberne.com)  
[mfriel@stollberne.com](mailto:mfriel@stollberne.com)

*Interim Liaison Plaintiffs' Counsel*

**BAKER & HOSTETLER LLP**

By: /s Paul Karlsgodt

Paul G. Karlsgodt  
1801 California Street, Suite 4400  
Denver, CO 80202  
Tel: (303) 861-0600  
Fax: (303) 861-7805  
Email: [pkarlsgodt@bakerlaw.com](mailto:pkarlsgodt@bakerlaw.com)

Daniel R. Warren  
**BAKER & HOSTETLER LLP**  
1900 East Ninth Street, Suite 3200  
Cleveland, OH 44114  
Tel: (216) 620-0200  
Fax: (216) 696-0740  
Email: [dwarren@bakerlaw.com](mailto:dwarren@bakerlaw.com)

Darin M. Sands  
**LANE POWELL PC**  
601 SW Second Avenue, Suite 2100  
Portland, OR 97204-3158  
Tel: (503) 778-2117  
Fax: (503) 778-2200  
Email: [SandsD@LanePowell.com](mailto:SandsD@LanePowell.com)

*Attorneys for Defendant Premera Blue Cross*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

*s/ Kim D. Stephens*

Kim D. Stephens